

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
NORTHEASTERN DIVISION**

SA&H ALABAMA HOLDINGS,)
LLC, and SOUTHERN HVAC)
CORPORATION,)
Plaintiffs,)
v.) CASE NO. 5:23-cv-1519-LCB
MICHAEL SCOTT SHOEMAKER,)
Defendant.)

DEFENDANT'S MOTION FOR SETTLEMENT CONFERENCE

Defendant Michael Scott Shoemaker moves for this Court to hold a court-hosted mediated-settlement conference. In support of this motion, Shoemaker states as follows:

1. The Court held a hearing on Plaintiff's Motion for Preliminary Injunction on December 12, 2023. At the hearing, the Court encouraged the parties to continue discussing settlement.
2. The parties have continued to discuss settlement, but they have been unable to agree on some key details related to a potential agreed-upon preliminary injunction.
3. Shoemaker believes that a settlement conference with the Court would help the parties bridge the existing gap.

4. Because of the preliminary injunction hearing, the Court is already aware of the facts and law in this case, and as a result, Shoemaker believes that a short settlement conference—scheduled either for a morning or afternoon—is the most efficient way to determine whether or not an interim resolution of the requested injunctive relief is possible.

5. The Court's standard Initial Order allows for a party to request a settlement conference.¹

6. The undersigned counsel conferred with Plaintiff's counsel, and Plaintiff's counsel has yet to respond.

7. Shoemaker therefore requests a settlement conference set at the Court's convenience.

Dated: December 18, 2023

/s/ Sam David Knight
Sam David Knight (ASB-1745-N62S)
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*Counsel for Defendant,
Michael Scott Shoemaker*

¹ The Court has yet to enter an Initial Order in this matter, but Shoemaker has reviewed the standard Initial Order on the Court's website.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on the following via the CM/ECF E-filing System and/or electronic mail on the 18th day of December, 2023:

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